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12/20/05

United States Environmental Protection Agency
Region V
POLLUTION REPORT

EPA Region 5 Records Ctr.



111444

Date: Tuesday, December 20, 2005

From: Bradley Benning, OSC

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Subject: Initiation of Action
Midwest Metalics Site
7955 West 59th Street, Summit, IL
Latitude: 41.7775
Longitude: -87.8203

POLREP No.:	1	Site #:	B5J2
Reporting Period:		D.O. #:	29
Start Date:	11/14/2005	Response Authority:	CERCLA
Mob Date:		Response Type:	Time-Critical
Completion Date:		NPL Status:	Non NPL
CERCLIS ID #:		Incident Category:	Removal Action
RCRIS ID #:		Contract #	68-S5-03-01

Site Description

The Site is located at 7955 West 59th Street in the City of Summit, Cook County, Illinois. Approximately 23 acres in size, the Site is located 10 miles southwest of Chicago, Illinois. The Site is located in the west-central section of Summit, and has the geographic coordinates of latitude 41.46.39 N, longitude 87.49.13 W. The Site is bordered by an industrial complex and 59th Street to the north; by railroad tracks and an automobile junkyard to the east; and by railroad tracks and railroad yard to the south and west. Although the Site is located in an industrial neighborhood, there is significant residential development less than 1000 feet to the southeast of the site.

The Site previously operated as a scrap metal processing/recycling facility for more than 20 years. The scrap metal shredder was utilized for the processing of scrap metal articles, such as automobile hulks and light iron. The shredding process facilitates separation of ferrous and nonferrous metals from nonmetallic materials contained in the feed material; after separation, the remaining material is commonly referred to as shredder residue. Shredder residues consist predominantly of nonmetallic solid material, including plastic, glass, rubber,

soil, carpet and fabric. It is an unconsolidated, heterogeneous solid, medium to dark brown in color and typically exhibiting a slight, musty odor.

Key Site features include the main ASR pile, two sets of abandoned railroad tracks, the former materials processing/shredder area, a surface water impoundment located along the northern edge of the Site, and two office/garage buildings currently being leased to trucking companies. The main ASR pile extends along the Site's eastern border in a north-northeast/south-southwest direction and measures approximately 875 feet along its longest axis. The pile ranges in height from 30 to 70 feet above ground surfaces and in width from 125 to 250 feet. Two separate operations are active at the Site. These companies have leased discrete areas in the west-central and northeastern sections of the Site to conduct their operations. Generally, ground elevations increase by five to 10 feet from north to south, with drainage patterns to the north and northeast. Water and/or leachate from the ASR pile was observed accumulating along the east border and flowing off the Site toward the adjacent automobile junkyard. Other small piles of ASR are located throughout the Site, and many of the berms on Site are constructed of ASR material.

A Removal Site Assessment was conducted on March 15, 2000, to determine the extent of the automobile shredder residue (ASR) previously observed at the Site, and to obtain additional analytical data to warrant a removal action. Samples of the ASR were collected from various locations throughout the Site. Eleven samples were collected at 200 foot intervals along the base of the large pile, and eight samples were collected on the top of the pile. Eight surface samples, a sediment sample and one water sample were also collected. The samples were analyzed for Total lead, TCLP metals, and PCBs. The results identified total lead levels ranging from 20.6 to 180,000 ppm, TCLP lead levels of 0.283 to 94.1ppm, and PCBs from 7.6 to 217.7 ppm. The ASR appears to cover an area in excess of 20 acres with depths ranging from one to 10 feet. The largest volume of ASR is located in the pile along the eastern perimeter and is estimated to contain 350,000 cubic yards. In addition to the ASR, the Site allegedly has four underground fuel storage tanks which probably contained diesel fuel for the Site vehicles. The condition and/or possible contamination from these tanks were not addressed during the initial site assessment activities. These potential fuel tanks are outside the scope of this removal action.

Current Activities

Meeting with the ERRS contractor, Earth Tech, Inc., occurred at the site on 11/14/05. Earth Tech will initiate design work and investigate sources of cover material. Mobilization to the site has not occurred, pending negotiations with the surrounding land owner for access rights.

U.S. EPA conducted a Removal Assessment at the Site on March 15, 2000, to further characterize the ASR located on Site. Twenty-nine samples were collected and confirmed that the ASR was contaminated with lead and PCBs. The Agency began working with the two trucking companies on Site, which were leasing portions of the property from the bankruptcy trustee, as both had expressed an interest in purchasing the property. Meetings were held with both parties to discuss prospective purchase agreements with the Agency. These meetings were unsuccessful as the cost for removal of the ASR was well beyond the value of the property. The Agency continued to monitor the Site while the

Illinois EPA continued its enforcement activities against the previous PRPs.

In the summer of 2001, routine inspections revealed the possibility of an underground fire at the south end of the ASR pile. Smoke was emanating from cracks at the surface of the pile and charred ASR was visible along the southern slope. On June 15, 2001, an infrared flyover was conducted to confirm the potential of an internal fire within the pile. The flyover confirmed a hot spot at the southern end of the pile, although subsequent inspections indicated no external evidence of a fire. U.S. EPA's most recent inspection, conducted on February 23, 2005, (discussed below), indicates the possibility that the internal temperature of the ASR pile remains very high. Over the next two years, the Site remained relatively inactive, the Illinois EPA pursued its case against the PRPs, the two trucking firms continued to utilize the property primarily for parking, and the Agency continued to conduct random inspections.

The Site was inspected on February 1, 2005, and the Agency found that significant activity had taken place. Apparently, a new owner has purchased the back taxes on a portion of the Site, which does not include the large pile of ASR material. Individuals employed by this new owner have removed the vegetation along the north and south perimeters; ASR material in these areas has been graded, and the lagoons along the north perimeter were in the process of being filled. ASR material has been moved and transported to the base of the existing pile. Additionally, cars and trucks are now being parked on the northern portion of the Site; apparently the new owner is preparing these areas for parking and storage. This new owner is aware of the Site conditions and has hired an environmental consultant. The Agency will work with the new owner on all future negotiations regarding mitigation at the Site; Agency strategy is discussed further in the Enforcement Addendum.

A subsequent inspection was conducted on February 23, 2005, to obtain additional photo documentation of the change in Site conditions. Approximately 75 photographs were taken during the inspection depicting various site changes and current conditions. These photographs documented that: (1) ASR had been moved to the base of the pile along the west side; (2) ASR had been pushed and graded along the south boundary just east of the old shredder; (3) the north and southwest perimeters were cleared of all vegetation; (4) lagoons along the north perimeter were being filled with debris and ASR; (5) sections of fence were missing along the north and west perimeter; (6) an old fuel tank was missing from the west base of the pile, creating a large pool of oil/water which has been released along the west base of the pile; (7) cracks were present at the south end of the pile, releasing steam and/or smoke; (8) the entire east slope showed the presence of steam and/or smoke although the temperature was in the 30's and it was a partly cloudy day; and (9) water and/or leachate continue to move off Site along the east Site perimeter.

Planned Removal Actions

- a. Develop and implement a Site-specific work plan, including a proposed time line for the main ASR pile and adjacent areas, excluding the property recently purchased

through the County tax sale.

- a. Develop and implement a Site-specific health and safety plan.
- a. Establish and maintain Site security measures during the removal actions, which may include security guard service.
- a. Develop and implement an air monitoring and sampling program during removal activities.
- a. Identify, sample and characterize the hazardous substances located at the Site.
- a. Excavate contaminated soil and ASR; stage on-site, as necessary.
- a. Consolidate ASR/soil material in preparation for on-site remediation.
- a. Construct a modified Subtitle D cap to secure the ASR/soil materials.
- a. Provide measures to prevent erosion and control runoff.
- a. Install fencing as needed to secure the disposal (capped) area.

Next Steps

Arrange for access to the site.

Mobilize personnel and equipment.

Begin consolidation of ASR on the site.

Key Issues

Negotiating with the surrounding landowner who also is a PRP for the EPA removal action.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$1,000,000.00	\$0.00	\$1,000,000.00	100.00%
RST/START	\$100,000.00	\$0.00	\$100,000.00	100.00%
Intramural Costs				
Total Site Costs	\$1,100,000.00	\$0.00	\$1,100,000.00	100.00%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

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